

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA,  
Complainant**

-v-

**HO WAN KWOK,  
a/k/a “Miles Guo,”  
a/k/a “Miles Kwok,”  
a/k/a “Guo Wengui,”  
a/k/a “Brother Seven,”  
a/k/a “The Principal,”**

**KIN MING JE,  
a/k/a “William Je,” and**

**YANPING WANG,  
a/k/a “Yvette,”**

**Defendants.,**

**Defendant.**

Criminal No.: 23 Cr. 118 (AT)

**SUPPLEMENT TO ECF 198**

**INDEPENDENT FORENSIC CUSTOMER  
REVIEW WITH SUPPORTING  
SUBMISSIONS BY MAZARS LLP**

Customers of the Himalaya Exchange, by and through undersigned counsel, Bradford L. Geyer, Esq., whose investments in the Exchange have been seized as actions ancillary to the core criminal prosecution in this case, hereby file this SUPPLEMENT to ECF 198 which contains an Independent Forensic Customer Review with Supporting Submissions by Mazars LLP (Mazars Report).

The Mazars report establishes that all 3,521 client accounts exist and match Himalaya Exchange records, that the associated HCN balances and HDO balances in the HEX customer database reconciled to the amounts held by my 3,521 clients, that total deposits and total redemptions balanced, and that the seized reserve funds are held in special custodian bank

accounts rather than in standard bank accounts (Mazars Report pages 36-37 and Exhibit 15).

### **Main Filing and Supporting Documents**

I.	Filing	Main	
II.	Independent Audit Report	E1	
III.	Letter to Undersigned Counsel from Candey.Com	E2	
IV.	Witness Statement by Sam Harvey Claydon	E3	
V.	Exhibit 3.1_ Example excerpts from the HEX Customer Database	E3.1	
VI.	Exhibit 4.1_ Onboarding Process Document	E4.1	
VII.	Exhibit 6.1_ Excerpts of the “Risk Scoring” tab on the HID Database	E6.1	
VIII.	Exhibit 6.2_ Extract of bank statements of the Exchange	E6.2	
IX.	Exhibit 6.3_ Mercantile Bank Custody Agreement	E6.3	
X.	Exhibit 6.4_ FV Bank Custody Agreement	E6.4	
XI.	Exhibit 6.5_ FV Bank Business Account Application	E6.5	
XII.	Mazars Appendix 1.1	A1.1	
XIII.	Mazars Appendix 1.2	A1.2	
XIV.	Mazars Appendix 5.1a	A5.1a	
XV.	Mazars Appendix 5.1b	A5.1b	
XVI.	Mazars Appendix 5.2	A5.2	
XVII.	Mazars Appendix 6.1	A6.1	6

Dated: December 21, 2023

RESPECTFULLY SUBMITTED,

/s/ Brad Geyer  
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/s/ Jamie Scher

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2023, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the District of Columbia.

/s/ Brad Geyer

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